

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

BURDLEY JEAN, et al.

CRIMINAL NO. 05-10110-MLW

UNITED STATES' CONSOLIDATED PROPOSED VOIR DIRE QUESTIONS

In addition to the Court's customary introduction to the jury, the United States requests that the Court ask prospective jurors the following *voir dire* questions:

1. Have you, a family member, or someone close to you ever been involved in a criminal case as either a victim, a witness, or a person charged with a crime?
2. Have you, a family member, or someone close to you ever been involved in the criminal justice system, either as a prosecutor, defense attorney, employee of a prosecutor's office or defense attorney, probation officer, court officer, or court clerk?
3. Have you, a family member, or someone close to you ever been employed by any law enforcement agency?
4. Have you, a family member, or someone close to you ever been employed in any aspect of the business of banking?
5. Have you, a family member, or someone close to you ever been affiliated with, or a member of, any group or organization, whether formal or informal, which is engaged in the study of or protest against the sovereignty of the United States government?
6. This is a federal case, brought in the name of the United States of America. The federal government is comprised of many agencies and departments, including the Department of

Justice and the Federal Bureau of Investigation. Have you, a family member, or someone close to you ever had any dealings with the federal government, including the agencies I mentioned, whether favorable or unfavorable, which might influence your consideration of the evidence in this case?

7. This case involves charges that the defendants conspired to commit bank fraud and charges that the defendants did in fact commit bank fraud by either cashing counterfeit checks at various banks in the New England area. Have you read or heard anything about this matter?

8. The indictment alleges that counterfeit checks were cashed at several banks and that one of the defendants sought access to account information of several companies with accounts at those banks. Have you, a family member, or someone close to you ever been employed by any of the following businesses: Bank of America; Fleet Bank; Sovereign Bank; Citizens Bank; [recite companies listed on Government's Consolidate Exhibit List]?

9. Are you familiar with any of the individuals on either the United States' or the defendants' witness lists?

10. Are you familiar with any of the attorneys involved in this case?

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: */s/ James P. Dowden*

JAMES P. DOWDEN
SCOTT GARLAND
Assistant U.S. Attorneys

CERTIFICATE OF SERVICE

I, James P. Dowden, Assistant U.S. Attorney, do hereby certify that I have, on May 9, 2008, caused a true and accurate copy of the foregoing to be served upon all counsel of record by filing the document with the Court electronically and by serving a copy of the foregoing on Defendant Edouard by U.S. First Class Mail.

/s/ James P. Dowden

JAMES P. DOWDEN
Assistant U.S. Attorney